

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ROBERT KENNY,

Plaintiff,

v.

PACIFIC INVESTMENT
MANAGEMENT COMPANY LLC, a
Delaware limited liability company;
PIMCO INVESTMENTS LLC,

Defendants.

No. CV 14-1987-RSM

STIPULATION AND ORDER
EXTENDING TIME FOR DEFENDANTS
PACIFIC INVESTMENT MANAGEMENT
COMPANY LLC AND PIMCO
INVESTMENTS LLC TO RESPOND TO
COMPLAINT

Defendants Pacific Investment Management Company LLC and PIMCO Investments LLC (collectively, “Defendants”) and Plaintiff Robert Kenny, through their undersigned counsel of record, hereby stipulate and agree as follows:

Plaintiff filed the Complaint, which consists of 58 pages and 172 paragraphs, on December 31, 2014.

Defendants timely filed a motion to dismiss Plaintiff’s Complaint on March 6, 2015, Plaintiff filed an opposition on April 20, 2015, and Defendants filed their reply brief on May 20, 2015.

On August 26, 2015, the Court issued an order denying Defendants’ motion to dismiss.

STIPULATION AND ORDER EXTENDING TIME FOR
DEFENDANTS TO RESPOND TO COMPLAINT (No.
CV 14-1987-RSM) – 1

116471-0001/LEGAL127550023.1

Ropes & Gray LLP
Prudential Tower,
800 Boylston St.
Boston, MA 02199-3600
Phone: 617.951.7000
Fax: 617.951.7050

Perkins Coie LLP
1201 Third Avenue,
Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

On August 28, 2015, counsel for Plaintiff and counsel for Defendants conferred regarding Defendants' request for a brief extension of time for Defendants to respond to Plaintiff's Complaint, and the parties agreed, subject to the Court's approval, that Defendants' response to the Complaint would be extended by 14 days, or until September 23, 2015.

WHEREAS, for good cause shown,

IT IS HEREBY STIPULATED by and among Plaintiff and Defendants, subject to the Court's approval, as follows:

Defendants' response to the Complaint shall be due on September 23, 2015.

Dated: this 31 day of August, 2015.

By: s/ Michael D. Woerner
 By: s/ Tana Lin
 By: s/ Laura R. Gerber
 By: s/ Ian Mensher
 Michael D. Woerner, WSBA No. 15452
 Tana Lin, WSBA No. 35271
 Laura R. Gerber, WSBA No. 34981
 Ian Mensher, WSBA #39593
Keller Rohrback L.L.P.
 1201 Third Avenue, Suite 3200
 Seattle, WA 98101
 Telephone: 206-623-1900
 Facsimile: 206-623-3384
 Email: mwoerner@kellerrohrback.com
tlin@kellerrohrback.com
lgerber@kellerrohrback.com
imensher@kellerrohrback.com

Michael J. Brickman (*Admitted Pro Hac Vice*)
Richardson, Patrick, Westbrook & Brickman, LLC
 174 East Bay Street
 Charleston, SC 29401
 Telephone: 843-727-6520
 Facsimile: 843-727-3103
 Email: mbrickman@rpwb.com

By: s/ Ronald L. Berenstein
s/ David F. Taylor
s/ Sean C. Knowles
 Ronald L. Berenstein, WSBA No. 7573
 David F. Taylor, WSBA No. 25689
 Sean C. Knowles, WSBA No. 39893
Perkins Coie LLP
 1201 Third Avenue, Suite 4900
 Seattle, WA 98101-3099
 Telephone: 206-359-8000
 Facsimile: 206-359-9000
 Email: rberenstein@perkinscoie.com
dftaylor@perkinscoie.com
sknowles@perkinscoie.com

Of Counsel

John D. Donovan (*Admitted Pro Hac Vice*)
 Robert A. Skinner (*Admitted Pro Hac Vice*)
 Amy D. Roy (*Admitted Pro Hac Vice*)
Ropes & Gray
 Prudential Tower
 800 Boylston Street
 Boston, MA 02199-3600
 Telephone: 617-951-7000
 Facsimile: 617-951-7050
 Email: John.Donovan@ropesgray.com
Robert.Skinner@ropesgray.com
Amy.Roy@ropesgray.com

STIPULATION AND ORDER EXTENDING TIME FOR
 DEFENDANTS TO RESPOND TO COMPLAINT (No.
 CV 14-1987-RSM) – 2

116471-0001/LEGAL127550023.1

Ropes & Gray LLP
 Prudential Tower,
 800 Boylston St.
 Boston, MA 02199-3600
 Phone: 617.951.7000
 Fax: 617.951.7050

Perkins Coie LLP
 1201 Third Avenue,
 Suite 4900
 Seattle, WA 98101-3099
 Phone: 206.359.8000
 Fax: 206.359.9000

Nina Fields Britt (*Admitted Pro Hac Vice*)
James C. Bradley (*Admitted Pro Hac Vice*)
Matthew A. Nickles (*Admitted Pro Hac Vice*)
**Richardson, Patrick, Westbrook & Brickman,
LLC**
1037 Chuck Dawley Boulevard, Bldg. A
Mount Pleasant, SC 29465
Telephone: 843-727-6500
Facsimile: 843-216-6509
Email: nfields@rpwb.com
jbradley@rpwb.com
mnickles@rpwb.com

Attorneys for Plaintiff

John C. Ertman (*Admitted Pro Hac Vice*)
Ropes & Gray
1211 Avenue of the Americas
New York, NY 10036-8704
Telephone: 212-596-9000
Facsimile: 212-596-9090
Email: John.Ertman@ropesgray.com

Attorneys for Defendants Pacific Investment
Management Company LLC and PIMCO
Investments LLC

ORDER

Pursuant to stipulation by the parties, and for good cause shown, **IT IS SO ORDERED**
this 1 day of September, 2015.



RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE

Presented by:

By: s/ Ronald L. Berenstein
By: s/ David F. Taylor
By: s/ Sean C. Knowles
Ronald L. Berenstein, WSBA No. 7573
David F. Taylor, WSBA No. 25689
Sean C. Knowles, WSBA No. 39893
Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: 206-359-8000
Facsimile: 206-359-9000
Email: rberenstein@perkinscoie.com
dftaylor@perkinscoie.com
sknowles@perkinscoie.com

STIPULATION AND ORDER EXTENDING TIME FOR
DEFENDANTS TO RESPOND TO COMPLAINT (No.
CV 14-1987-RSM) – 3

116471-0001/LEGAL127550023.1

Ropes & Gray LLP
Prudential Tower,
800 Boylston St.
Boston, MA 02199-3600
Phone: 617.951.7000
Fax: 617.951.7050

Perkins Coie LLP
1201 Third Avenue,
Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

Of Counsel

John D. Donovan (*Admitted Pro Hac Vice*)
Robert A. Skinner (*Admitted Pro Hac Vice*)
Amy D. Roy (*Admitted Pro Hac Vice*)

Ropes & Gray

Prudential Tower
800 Boylston Street
Boston, MA 02199-3600
Telephone: 617-951-7000
Facsimile: 617-951-7050
Email: John.Donovan@ropesgray.com
Robert.Skinner@ropesgray.com
Amy.Roy@ropesgray.com

John C. Ertman (*Admitted Pro Hac Vice*)

Ropes & Gray

1211 Avenue of the Americas
New York, NY 10036-8704
Telephone: 212-596-9000
Facsimile: 212-596-9090
Email: John.Ertman@ropesgray.com

Attorneys for Defendants Pacific Investment
Management Company LLC and PIMCO Investments
LLC

By: s/ Michael D. Woerner

By: s/ Tana Lin

By: s/ Laura R. Gerber

By: s/ Ian Mensher

Michael D. Woerner, WSBA No. 15452

Tana Lin, WSBA No. 35271

Laura R. Gerber, WSBA No. 34981

Ian Mensher, WSBA #39593

Keller Rohrbach L.L.P.

1201 Third Avenue, Suite 3200

Seattle, WA 98101

Telephone: 206-623-1900

Facsimile: 206-623-3384

Email: mwoerner@kellerrohrbach.com

tlin@kellerrohrbach.com

lgerber@kellerrohrbach.com

imensher@kellerrohrbach.com

STIPULATION AND ORDER EXTENDING TIME FOR
DEFENDANTS TO RESPOND TO COMPLAINT (No.
CV 14-1987-RSM) – 4

116471-0001/LEGAL127550023.1

Ropes & Gray LLP
Prudential Tower,
800 Boylston St.
Boston, MA 02199-3600
Phone: 617.951.7000
Fax: 617.951.7050

Perkins Coie LLP
1201 Third Avenue,
Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

1
2
3 Michael J. Brickman (*Admitted Pro Hac Vice*)
4 **Richardson, Patrick, Westbrook & Brickman, LLC**
5 174 East Bay Street
6 Charleston, SC 29401
7 Telephone: 843-727-6520
8 Facsimile: 843-727-3103
9 Email: mbrickman@rpwb.com
10
11

12
13 Nina Fields Britt (*Admitted Pro Hac Vice*)
14 James C. Bradley (*Admitted Pro Hac Vice*)
15 Matthew A. Nickles (*Admitted Pro Hac Vice*)
16 **Richardson, Patrick, Westbrook & Brickman, LLC**
17 1037 Chuck Dawley Boulevard, Bldg. A
18 Mount Pleasant, SC 29465
19 Telephone: 843-727-6500
20 Facsimile: 843-216-6509
21 Email: nfields@rpwb.com
22 jbradley@rpwb.com
23 mnickles@rpwb.com
24
25
26
27

28 Attorneys for Plaintiff
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51

STIPULATION AND ORDER EXTENDING TIME FOR
DEFENDANTS TO RESPOND TO COMPLAINT (No.
CV 14-1987-RSM) – 5

116471-0001/LEGAL127550023.1

Ropes & Gray LLP
Prudential Tower,
800 Boylston St.
Boston, MA 02199-3600
Phone: 617.951.7000
Fax: 617.951.7050

Perkins Coie LLP
1201 Third Avenue,
Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000